

Connect America Phase II Challenge Process Form  
OMB Control Number 3060-1188  
FCC Form 505

Filing Entity: Duo County Telephone Cooperative Corporation, Inc.

FRN (if applicable): 0004261061

Name of Person Filling Out Form: Lans Chae

Mailing Address of Person Filling Out Form: 6849 Peachtree-Dunwoody Rd., Bldg. B-3, Suite 200, Atlanta, GA 30328-1610

Email Address of Person Filling Out Form: [lchase@jsitel.com](mailto:lchase@jsitel.com)

Phone Number of Person Filling Out Form: 770-569-2105

Name of Person Certifying Data within Form: Daryl Hammond

Mailing Address of Person Certifying Data within Form: 2150 N. Main St., Jamestown, KY 42629

Email Address of Person Certifying Data within Form: dhammond@duotel.com

Phone Number of Person Certifying Data within Form: 270-343-1111

Response to Challenge

State	Name of Entity Making Initial Challenge	FRN of Entity Making Initial Challenge (if provided)	Insert X if Speed Criteria is at Issue	Insert X if Usage Allowance Criteria is at Issue	Insert X if Latency Criteria is at Issue	Insert X if Price Criteria is at Issue	Insert X if Voice Criteria is at Issue	Type of Supporting Evidence	Additional Comments	OMB Control Number 3060-1188
KY	Windstream		X	X	X	X	X	Official service boundary maps; FCC Study Area Boundary (SAB) maps; Census Bureau maps. Declaratory Statement	This census block is located wholly within the service territory of Duo County Telephone Cooperative Corporation, a rate-of-return carrier. Therefore, this census block should not be on the eligible list for CAF Phase II funding. See Attachments A through D.	
KY	Windstream		X	X	X	X	X	Official service boundary maps; FCC Study Area Boundary (SAB) maps; Census Bureau maps. Declaratory Statement	This census block is located wholly within the service territory of Duo County Telephone Cooperative Corporation, a rate-of-return carrier. Therefore, this census block should not be on the eligible list for CAF Phase II funding. See Attachments A through D.	
KY	Windstream		X	X	X	X	X	Official service boundary maps; FCC Study Area Boundary (SAB) maps; Census Bureau maps. Declaratory Statement	This census block is located wholly within the service territory of Duo County Telephone Cooperative Corporation, a rate-of-return carrier. Therefore, this census block should not be on the eligible list for CAF Phase II funding. See Attachments E through H.	

OMB Control Number 3060-1188

**Accuracy and Due Diligence Certification**

*All Filers Must Fill Out*

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials: TEP

Date: 11/10/2014

**Notice of Challenge Certification**

*(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)*

**Service of Notice Successful**

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials:

Date:

**Service of Notice Unsuccessful**

By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties

that Could Not Be

Served:

Certifier's Initials:

Date:



November 10, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

ATTN: Gilbert Smith, Telecommunications Access Policy Division  
Wireline Competition Bureau

**RE: WC Docket No. 14-93 and DA 14-1397**  
**Replies Sought in Connect America Phase II Challenge Process**

Dear Ms. Dortch:

Duo County Telephone Cooperative Corporation ("Duo County") files the attached FCC Form 505 and supporting evidence with the Federal Communications Commission ("FCC") in WC Docket No. 14-93 pursuant to the challenge process framework adopted by the Wireline Competition Bureau ("Bureau") to finalize the list of areas that will be eligible for Connect America Phase II model-based support.<sup>1</sup> Duo County is filing this response in support of its contention that certain blocks deemed eligible for CAF Phase II support are wholly located within its rate-of-return service area territory and therefore ineligible for support.

On June 30, 2014, the FCC released Public Notice DA 14-942 announcing the commencement of the Connect America Phase II challenge process and the release by the Bureau of a list of census blocks that were deemed initially eligible for Phase II support.<sup>2</sup> Parties had until August 14, 2014 to file FCC Form 505 challenging the inclusion or exclusion of particular census blocks on this list.

On September 26, 2014, the FCC released Public Notice DA 14-1397 announcing that the Bureau completed its initial review of the Connect America Phase II challenges and determined which of those challenges presented sufficient evidence to make a *prima facie* case that the status of the census block should be changed for purposes of determining where Phase II support would be offered.<sup>3</sup>

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<sup>1</sup> *Connect America Fund*, WC Docket No. 10-90, Report and Order, 28 FCC Rcd 7211 (Wireline Competition Bureau)(*Phase II Challenge Process Order*).

<sup>2</sup> *Wireline Competition Bureau Commences Connect America Phase II Challenge Process*, WC Docket No. 14-93 et al., Public Notice, 29 FCC Rcd 7986 (Wireline Comp. Bur. 2014) (*Phase II Challenge Process Commencement Public Notice*).

<sup>3</sup> *Replies Sought in Connect America Phase II Challenge Process*, WC Docket No. 14-93 et al., (Wireline Comp. Bur. 2014) (*Phase II Challenge Process Replies Public Notice*), September 26, 2014.

The Bureau also released a list of census blocks for which a party had made a *prima facie* challenge that the block should not be eligible for Phase II support, and a list of census blocks for which a party had made a *prima facie* challenge that the block should be eligible for Phase II support. Parties have until November 10, 2014 to file FCC Form 505 to respond to the inclusion of particular census blocks on either list.

In addition to the FCC Form 505, Duo County submits the attached **Declaratory Statement** along with the following supporting evidence identified as Attachments A through H:

**Attachment A:** Copy of the map on file with the Kentucky Public Service Commission indicating the service area boundary between Duo County and Windstream (f/k/a GTE) in Cumberland County, Kentucky.

**Attachment B:** Screen capture of the FCC's Study Area Boundary ("SAB") Data map indicating the study area boundary between Duo County and Windstream in Cumberland County, Kentucky.

**Attachment C:** Screen capture of the FCC's SAB Data map overlaid with the FIPS codes (in red) indicating the approximate location of the two census blocks (210579502001052 and 210579502001057) in Cumberland County, Kentucky to which Duo County is responding.

**Attachment D:** Copies of a portion of two Census Bureau block maps overlaid with the FIPS codes (in red) and the block number highlighted in green indicating the two census block in Cumberland County, Kentucky to which Duo County is responding.

**Attachment E:** Copy of the map on file with the Kentucky Public Service Commission indicating the service area boundary between Duo County and Windstream (f/k/a Contel of Kentucky) in Russell County, Kentucky.

**Attachment F:** Screen capture of the FCC's SAB Data map indicating the study area boundary between Duo County and Windstream in Russell County, Kentucky.

**Attachment G:** Screen capture of the FCC's SAB Data map overlaid with the FIPS code (in red) indicating the approximate location of the census block (212079604001026) in Russell County, Kentucky to which Duo County is responding.

**Attachment H:** Copies of a portion of two Census Bureau block maps overlaid with the FIPS code (in red) and the block number highlighted in green indicating the census block in Russell County, Kentucky to which Duo County is responding.



Duo County hereby avers and confirms the census blocks to which it is responding and is providing supporting evidence are wholly located within the Duo County's incumbent rate-of-return service area and therefore should not be eligible for CAF Phase II support.

Sincerely,

A handwritten signature in black ink, appearing to read "T. E. Preston", followed by a long horizontal line extending to the right.

Thomas E. Preston  
CEO/Executive Vice President  
Duo County Telephone Cooperative Corporation

cc: Gilbert Smith, Telecommunications Access Policy Division  
Wireline Competition Bureau

Attachments

**DECLARATION OF DUO COUNTY TELEPHONE COOPERATIVE CORPORATION**

I, Thomas E. Preston, CEO/Executive Vice President of Duo County Telephone Cooperative Corporation, Inc. ("Duo County") have personal and direct knowledge of the representations made by Duo County in its Connect America Phase II Challenge Process Form ("Form 505"). Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained in Duo County's Form 505. I verify that the census blocks to which Duo County is responding and is providing supporting evidence are wholly located within the Duo County's incumbent rate-of-return service area and therefore should not be eligible for CAF Phase II support.

I declare under penalty of perjury that the foregoing is true and correct.

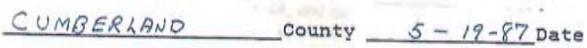
Executed on this 10th day of November, 2014.



Thomas E. Preston, CEO/Executive VP  
Duo County Telephone Cooperative  
Corporation, Inc.  
2150 N. Main St.  
Jamestown, KY 42629  
270-343-1111

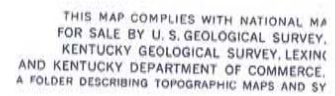
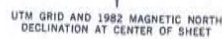
# Attachment A





General Telephone Company      Duo County Telephone Coop.

By William W. N. [Signature]  
General Manager



## Attachment B



e

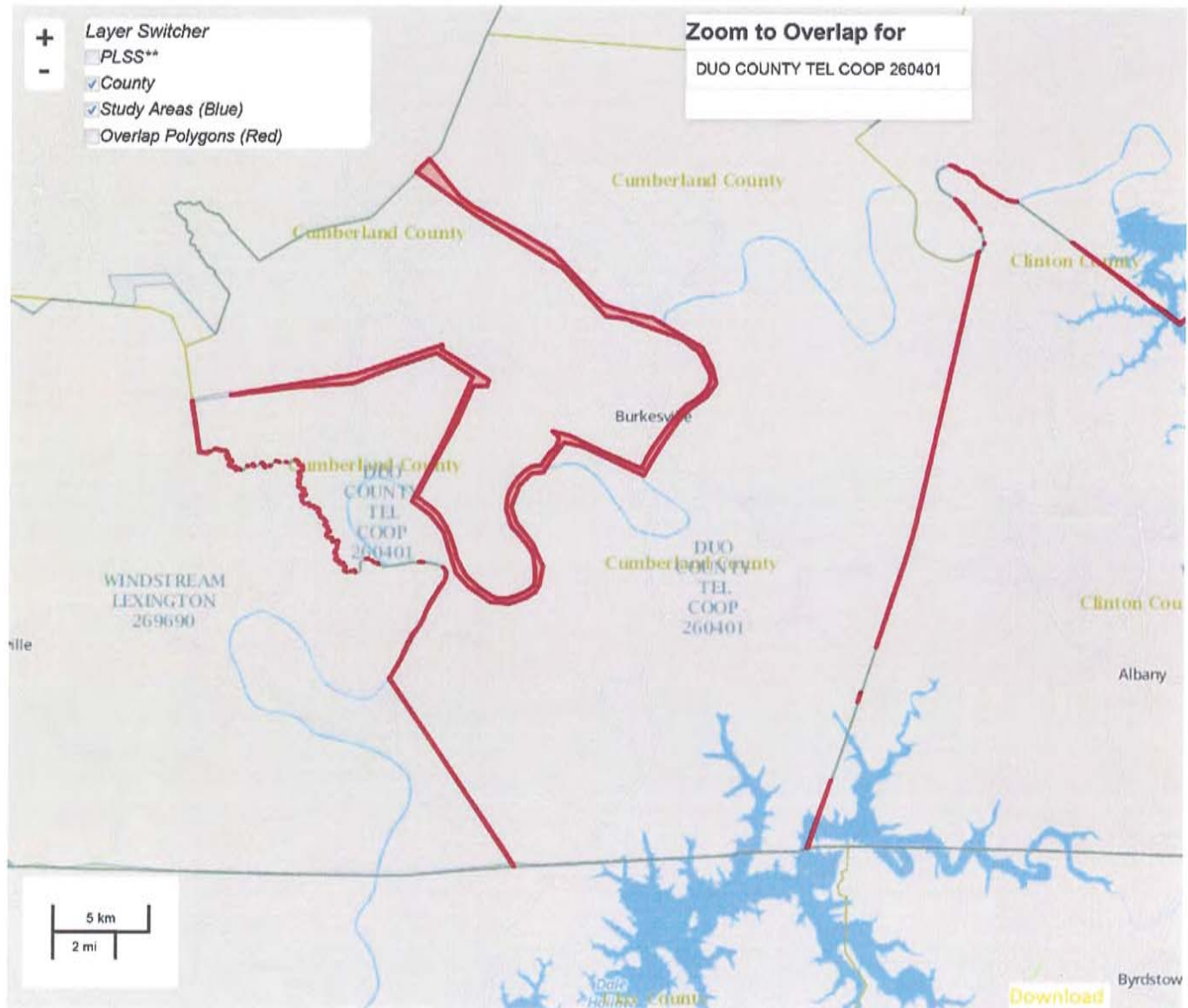


Study Area Boundary Data

DUO COUNTY TEL

as of August 15, 2014

COOP 260401



Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
Phone: 1-888-225-5322

RSS  
Privacy Policy  
Moderation Policy  
Website Policies & Notices  
Required Browser & Plug-ins

FOIA  
No Fear Act Data  
Open Government Directive  
Plain Writing Act  
2009 Recovery and Reinvestment Act

**Download Data**  
\*The map displays (shaded and outlined in blue) the study area boundaries submitted and certified by

## Attachment C

e

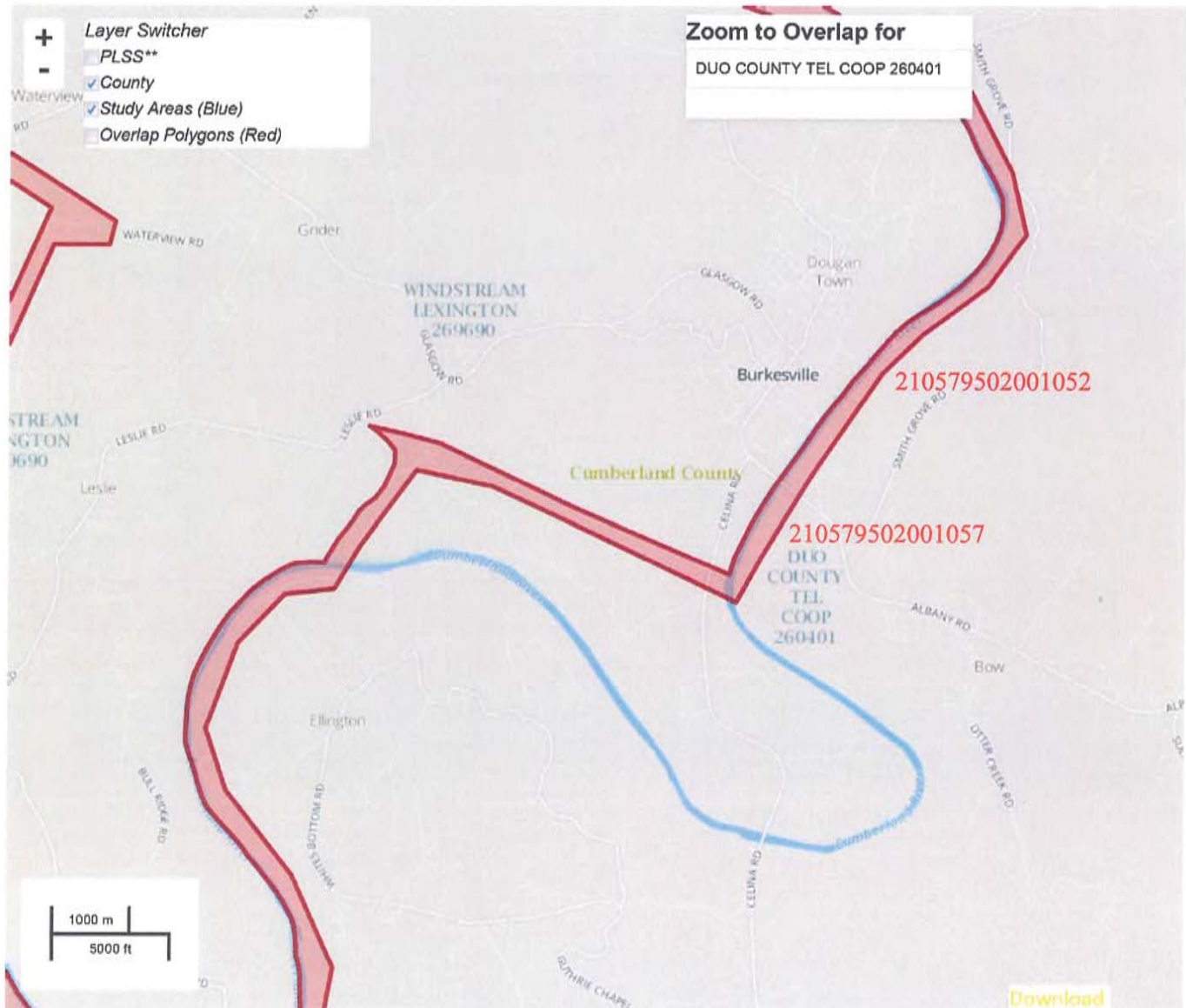


Study Area Boundary Data

DUO COUNTY TEL

as of August 15, 2014

COOP 260401



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 Washington, DC 20554  
 Phone: 1-888-225-5322

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[Open Government Directive](#)  
[Plain Writing Act](#)  
[2009 Recovery and Reinvestment Act](#)

[Download Data](#)  
 \*The map displays (shaded and outlined in blue) the study area boundaries submitted and certified by

## Attachment D

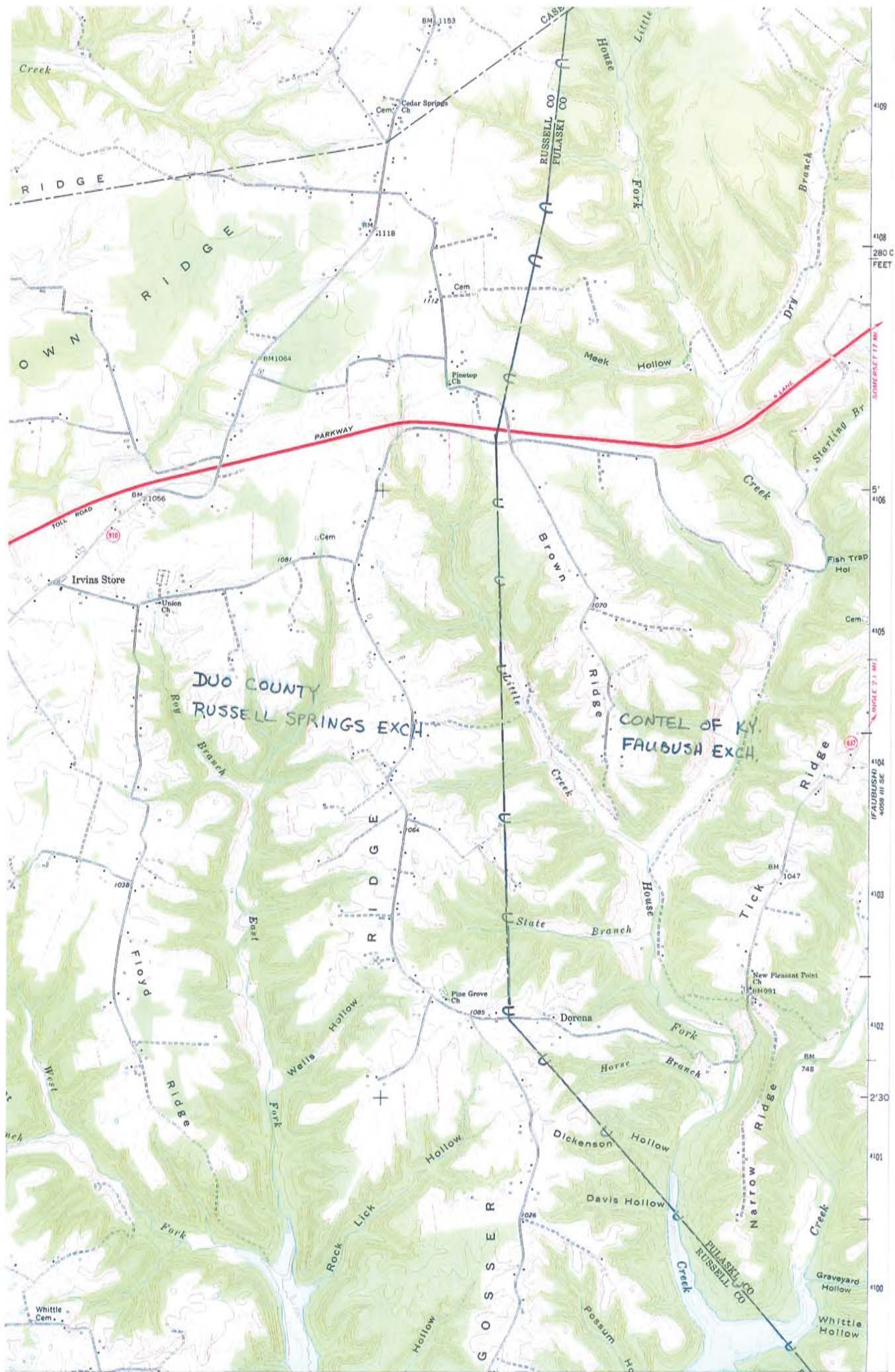






## Attachment E





## Attachment F



e

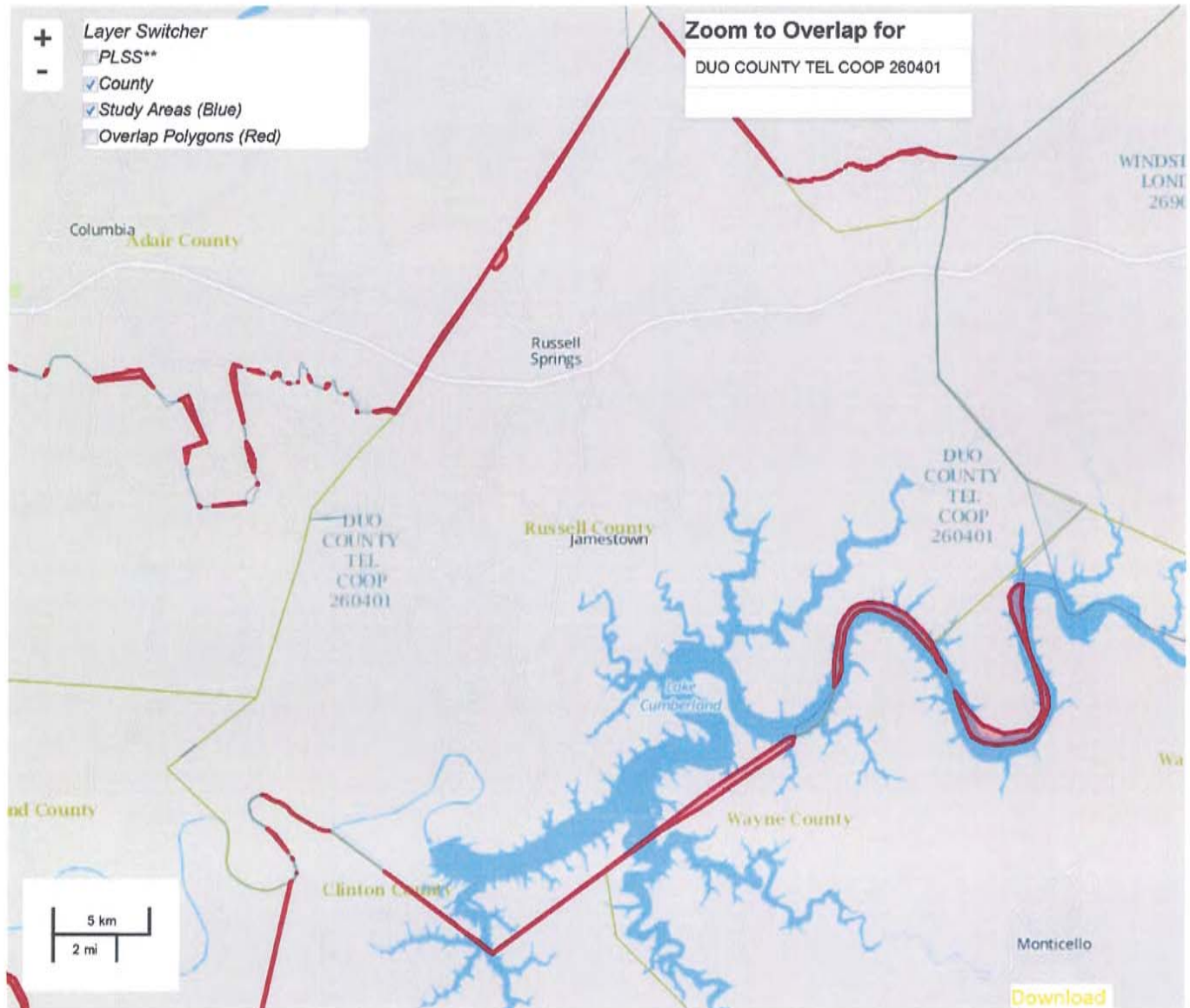


Study Area Boundary Data

DUO COUNTY TEL

as of August 15, 2014

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[Download Data](#)  
\*The map displays (shaded and outlined in blue) the study area boundaries submitted and certified by



# Attachment G

e

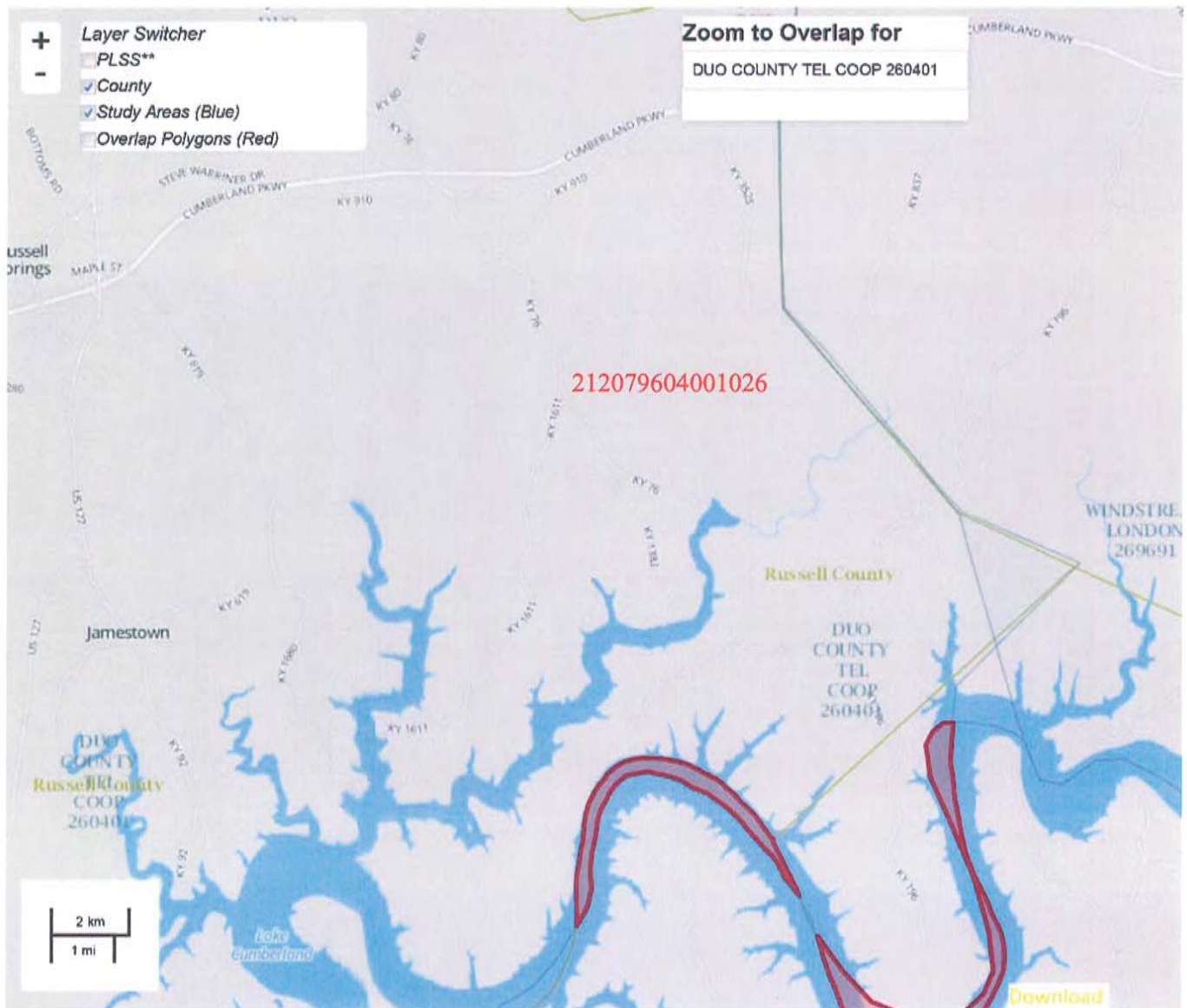


Study Area Boundary Data

DUO COUNTY TEL

as of August 15, 2014

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## Attachment H





## 2010 CENSUS - CENSUS BLOCK MAP: Russell County

